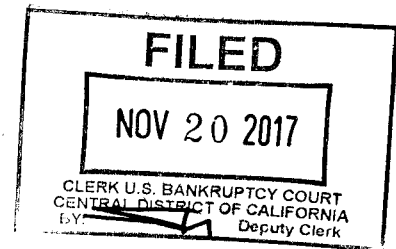


LARNITA PETTE
2588 El Camino Real, Suite F-195
Carlsbad, CA 92008

Telephone: (707) 853-2049

Larnita Pette in Pro Se



UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

BEVERLY MONIQUE MURRAY-CALCOTE

Debtor,

) Chapter 7

) Case No.: 2:17-bk-11972-RK

) Adv. No.: 2:17-ap-01488-RK

Larnita Pette

Plaintiff

) **PLAINTIFF LARNITA PETTE'S
INITIAL DISCLOSURES
PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 26**

vs.

Beverly Monique Murray-Calcote

Defendant

BY FAX

PLAINTIFF Larnita Pette referred to below as the "disclosing party" hereby submits
the following disclosures in accordance with Federal Rule of Civil Procedure 26 ("Rule
26").

I.

Rule 26(a)(1)(A)(i)

The names and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support her claims or defenses unless the use would be solely for impeachment (Exhibit 1)

II.

Rule 26(a)(1)(A)(ii)

A description by category and location of all documents, electronically stored information, and tangible things that the disclosing party has in her possession, custody, or control and may use to support her claim or defenses, unless the use would be solely for impeachment (Exhibit 2).

III.

Rule 26 (a)(1)(A)(iii)

The computation of damages for the pending lawsuits filed with the San Diego County Superior Court and the Orange County Superior Court. The documents on which the computations were based are part of a creditor Proof of Claim filed by the disclosing party the Bankruptcy estate of Beverly Monique Murray-Calcote on November 17, 2017. A Summary of the Proof of Claim is listed bellow:

Proof of Claim Summary

1.	San Diego County Superior Court:	\$507,029.11
	Case Number: 37-2015-00015654-CU-PO-CTL	
2.	Orange County Superior Court:	\$198,022.06
	Case Number: 30-2016-00863391-PR-TR-CJC	
3.	TOTAL	\$705,051.17

///

///

///

IV.

Rule 26(a)(1)(A)(iv)

As far as know, there is no insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment. Discovery is ongoing.

DATED: November 19, 2017



LARNITA PETTE in Pro Se

EXHIBIT 1

Rule 26(a)(1)(A)(i) Disclosures

Name	Contact Information	Subject Matter
Cynthia McNamee		Contacts, 9/26/14 reception
Sheri Madison-Johnson		9/26/14 reception
Kevin Sanders		Decedent's violence behavior;
Beverly J. Madison		Bobbie J. Rives Bi-Polar
Joseph Calcote	Saxxon and Associates, Inc.	Listing and sale of 363 Cerro St. property
Lisa Mitchell		9/26/14 reception
George Sanders	Dallas, Texas	Assaulted by Bobbie J. Rives; 9/26/14 reception
Russell Griffith, Esq.	Rochelle and Griffith	
Lois Kelly, Esq.	Law Office of Lois Brown Kelly	TPO response; R. Griffith communications
Rosita Coble		Bobbie J. Rives violent behavior
David Wells	Eternal Hill Mortuary	Funeral Director
George Marones	Eternal Hills Mortuary	Distribution of Ashes
Ingrid Pasco	Keller Williams Carlsbad	Buyer's Agent Details 363 Cerro
Marie-Noelle Gheradi	363 Cerro Street	Buyer
Bruno Gherardi	363 Cerro Street	Buyer
Ed Kirkman	359 Cerro Street	Paid \$1,000 for watching Residence which had an operational monitored Security System installed; Declaration Anti-SLAPP Motion
Jacinta Kirkman	359 Cerro Street	Paid \$1,000; Declaration Anti-SLAPP Motion
Renu Singh	369 Cerro Street	12/26/14 Defendant
Ganz Chockalingham	369 Cerro Street	Pette Gormutt Advisor; 12/26/14 text
Rosalyn Baxter-Jones, MD		Long term Rives family friend Contact with Sanders/Calcote re: B. Rives and B. Madison
Dr. Noli Cava MD		B. Rives PCP; 2011-death notation of Rives dementia; 5/14 tried to

		refer to psychiatrist-Rives refused.
Jeffery Wasserstrom, MD		Ophthalmologist treated B. Rives; considered non-compliant patient
Nicholas Zubyk, MD		Ophthalmologist treated B. Rives; 5/15 letter to Wasserstrom noted that B Rives was totally confused re: medication protocol; considered non-compliant patient
Raymond Fink, MD		Endocrinologist, noted dementia in diagnosis notes
James Sinclair, MD		Hematologist
PengFeng Du, MD		Cardiologist
Louis Ventura, Esq.		Anti-SLAPP motion filed 2/23/14.
Joseph Calcote	Saxxon and Associates, Inc.	Listing Agent for sale of 363 Cerro Street
Tim Brennan	H.R. Block, Encinitas, CA	B. Rives2014 tax preparer; expressed concerns to Pette re: Rives comprehension.
Donna Arnicar, RN		Called to home by Pette Witnessed B. Rives removed from 363 Cerro Street 2/16/11; Affidavit filed with 8/12/14 TPO response.
Terry	CVS Pharmacy, Encinitas, CA	CVS pharmacy Clerk interacted with B. Rives for over 25 years.
Laura Marking		Long term neighbor to John and Bobbye Rives
Tina Buchanan, MSW	Vital Care Home Health	Referrals to Dr. Cava and APS for Psychological follow-up for B. Rives and Pette; Pette agreed; Rives refused.
Anna Barasas, RN	Case manager for Vital Care Home Health	Suggested anti-anxiety medication for B. Rives.
Michelle Schatel, MFT	Southern Caregivers Resource Center- Case manager for Pette	7/17/14-Made referral to APS on behalf of Pette after overhearing Rives

		threaten Pette while Pette was on phone updating her on events of 7/13-7/15/2014.
Lynn Baum	Advanced Hearing Care Encinitas, CA 92024	Audiologist for B. Rives
Rhonda A. Sanders		Calcote's cousin
Theresa Whetstone		Overheard B. Rives verbal abuse of Pette multiple times.
Patty Fernandez	Baldwinsville, NY	Overheard B. Rives verbal abuse of Pette; attempted to reason with B. Rives.
Margo Sanders-Randle	San Diego, CA	9/26/14 reception
Ronald Randle	San Diego, CA	9/26/14 reception
Rev. Patrick Wafer	San Diego, CA	October 12, 2014 storage
Ann Rives	Durham, NC	2013 letter to B. Rives expressing concerns; overheard verbal abuse of Pette; attempts to reason with Rives
Karen Raposa	Wells Fargo Bank	40 year banking relationship with John and Bobbye Rives bank employees noticed B. Rives declining.
Loren Ibarra	Wells Fargo Bank	10 year banking relationship with John/Bobbye Rives
Rev. Brenda Sharp		Bobbye J. Rives Trust
Christine Davies PERT	San Diego County Sheriff Dept.	12/20/10, 7/15/14, 7/22/14 response; 7/15/14 voicemail for Pette
Shelly Sharp		9/26/14 Reception
Sherice Sharp		9/26/14 Reception

EXHIBIT 2

Rule 26(a)(1)(A)(ii) Disclosures

"Residence" refers to 363 Cerro Street, Encinitas, CA 92024

Document Description	Location
Pette 2011, 2013, 2014-Cell Phone records - Calcote/Pette calls	Pette
7/15/14 Christine Davies PERT voicemail left for Pette re: B. Rives	Pette
9/1/14 multiple conversations with Calcote re: Bobbye Rives, condition and status	Calcote, Pette
9/1/14 B. Rives Hospital Admission Authorization signed by Calcote as DPOAHC	Calcote, Sanders, Pette, Attorneys, Scripps Encinitas Memorial Hospital
Russell Griffith faxed DPOAHC to hospital on 9/2/14	Scripps Encinitas Memorial Hospital , Calcote, Sanders, Griffith
9/7/14 Calcote visit to LVDC SNF to see B. Rives while telling Pette "she did not know where her mother was taken by Sanders when she was released from the hospital."	LVDC records, Calcote, Pette
September 14, 2014 Bobbye J. Rives died.	LVDC Skilled Nursing Facility, Dr. Givens Medical Director LVDC, Sanders, Eternal Hills Mortuary, George Sanders, Kevin Sanders, Ed Kirkman, Russell Griffith,
November 12, 2012 defamatory letter drafted by Russell Griffith, Esq.	Eternal Hills Mortuary, Scripps Hospital, R. Griffith, Sanders, Calcote, Pette
September 16, 2014 letter drafted by Russell Griffith, Esq.	R. Griffith, Sanders, Calcote, Eternal Hills Mortuary, Calcote, Sanders, Pette
September 19, 2014 appointment of Trustees Russell Griffith letter	Trust beneficiaries, Sanders, Calcote

Communications R. Griffith and L. Kelly re: retrieving Pette's personal property in Residence 9/14 to 11/14.	Attorneys Griffith and Kelly, Calcote, Sanders, Pette
Calcote contacts re: IA American Life Insurance policy naming Pette beneficiary; failure to notify Pette of existence of policy 9/24/14.	Calcote, Sanders, Pette
Purchase offer for Residence 11/14	Calcote, Sanders, Saxxon and Assoc. Joseph Calcote, Pette, Metro Escrow, Keller Williams, Gherardi
Residence sold "as is".	Calcote, Sanders, Saxxon & Assoc. Joseph Calcote
There was no mortgage on the Residence.	Calcote, Sanders, Saxxon & Assoc Joseph Calcote. Sanders, Pette
12/21/14 text message from Sanders – Residence is sold.	Pette
12/18/14 voicemail from Cynthia McNamee calling for Calcote	Pette
12/21/14 voicemail form C. McNamee calling for Calcote	Pette
12/26/14 Text pictures of Bobbye Rives headstone with cemetery plot location-The first and only information from Calcote.	Pette
12/26/14 text message from Ganz Chockalingham; Calcote entered shed at Residence which was sold on 12/16/14 and left key with his wife	Pette
January 2014 Russell Griffith letter to Ann Rives-No appraisal, Residence sold for more than comparable homes.	A. Rives, Calcote, Sanders Griffith, Pette
12/20/14 Pette's first request for Trust Preliminary Accounting	Griffith, Calcote, Sanders
Russell Griffith communications	Griffith, Calcote, Sanders, Pette

with Pette re: Distributions to the beneficiaries of the Trust and Preliminary Accounting 1/15-3/15.	
3/20/15 Text from Sanders; 1st partial distribution mailed to Pette beneficiaries on 3/19/15	Griffith, Calcote, Sanders, Pette
SDCSC Complaint filed May 8, 2015	Sanders, Calcote, Griffith, Pette Attorneys
Communications with IA American Life Insurance regarding letter mailed to Pette notifying her that the claim form mailed to Calcote had not been received 6/15.	Pette
Calcote SDCSC Interrogatory responses, Srogs, Frogs, RFP, RFA, received.	Calcote, Pette, Attorneys
Calcote DPOAHC provided in response to RFP.	Calcote, Sanders, Pette Attorneys
Subpoenas issued by Pette	Calcote, Sanders, Pette, Attorneys
Subpoena responses received	Pette and Attorneys Abbott, Blea
Stipulation and Order for release of Bobbye J. Rives Adult Protective Services (APS) Records issued 12/1/15	Calcote, Sanders, Pette, Attorneys
Chris Albence Trust Preliminary Accounting and letter dated 12/11/2015	Calcote, Sanders, Pette, Attorneys
SDCSC FAC filed 12/30/15	Sanders, Calcote, Pette, Attorneys
Calcote Amended Answer to SDCSC Complaint	Calcote, Sanders, Pette Attorneys
APS Records available 1/26/16	Calcote, Sanders, Pette, Attorneys
Bobbye J. Rives Trust bank statements (redacted by Calcote, Sanders)	Calcote, Sanders, Pette, Attorney Abbott
Communications re: request and delay for Pette's 2 nd distribution	Attorneys Abbott and Albence, Calcote, Sanders, Pette

from Trust and trust accounting 10/6/15 to 11/19/15.	
Bobbie J. Rives Trust Preliminary Accounting 12/11/15	Calcote, Sanders, Pette, Beneficiaries, Attorneys
January 20, 2016 Calcote and Sanders were seriously considering filing for BK within next 60 days.	Hosey, Albence, Abbott, Blea, Sanders, Calcote, Pette
Louis Ventura association of counsel for Anti-SLAPP motion dated 2/23/2014	Calcote, Sanders, Pette Attorneys
Anti-SLAPP Motion filed by Calcote and Sanders 2/24/15	Calcote, Sanders, Pette, Attorneys
Calcote Declaration (Anti-SLAPP)	Sanders, Calcote, Pette, Attorneys
Pette Anti-SLAPP Motion Objection	Calcote, Sanders, Pette, Attorneys
Pette Anti-SLAPP Motion Declaration	Calcote, Sanders, Pette, Attorneys
Lois Kelly, Esq. Anti-SLAPP Motion Declaration	Calcote, Sanders, Pette, Attorneys
OCSC Petition to Remove filed 7/13/16	Calcote, Sanders, Pette, Attorney's Abbott and Blea
Anti-SLAPP Motion Minute Order denying motion filed 8/23/16	Calcote, Sanders, Pette, Attorneys
Calcote Amended Objections to OCSC Petition to Remove 1/6/17	Sanders, Calcote, Pette and Attorney Abbott
1/25/17 Sanders filed for Chapter 7 bankruptcy Case 8:17-bk-10265	Pette, SDCSC and OCSC courts stays notified before initial 341(a)
2/23/17 Calcote filed for Chapter 7 bankruptcy.	Pette, Attorney Abbott, SDCSC and OCSC notified after initial 341(a) of stays

PROOF OF SERVICE

I, Carol J. Spizzirri (name), declare as follows. I am over the
age of 18 years. My address is:

1930 West San Marcos Blvd., Sp 285

San Marcos, CA 92078

On November 19, 2017 (date), I served the foregoing document described
as:

Plaintiff Larita Pate's Initial Disclosures Pursuant to FRCP 26

on all interested parties in this action by placing a true and correct copy thereof in a
sealed envelope, with first-class postage prepaid thereon, and deposited said
envelope in the United States mail in Encinitas, addressed
to: (city, state)

Oak Tree Law (name)

Larry Fieselman, Esq. (address)

10900 183rd Street, Suite 270 (address)

Cerritos, CA 90703


Beverly M. Murray-Calcote (name)

3166W Avenue M2 (address)

Lancaster, CA 93536 (address)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 19, 2017 at Encinitas, CA 92024.
(date) (place of signing)

 (signature)
Carol J. Spizzirri (name)

Served By U. S. Mail (continued)

Julie Villalobos
Oak Tree Law
10900 183rd Street, Suite 270
Cerritos, CA 90703

ATTORNEY FOR CHAPTER 7 TRUSTEE

Noreen A. Madoyan
Jeremy W. Faith
Margulies Faith, LLP
16030 Ventura Blvd., Suite 470
Encino, CA 91436

CHAPTER 7 TRUSTEE

Rosendo Gonzales
Gonzales & Associates, PLC
530 South Hewitt Street, Suite 148
Los Angeles, CA 90013

UNITED STATES TRUSTEE

Kenneth G. Lau
Office of the United States Trustee
915 Wilshire Blvd., Suite 1850
Los Angeles, CA 90017

Judge's Copy

Hon. Robert Kwan
United States Bankruptcy Court
255 E. Temple Street, Room 940
Attn: Mail Room Clerk-Judge's Copy